

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

EQUAL EMPLOYMENT	)	
OPPORTUNITY COMMISSION,	)	
Plaintiff,	)	
	)	
and	)	
	)	
MELINDA HUERTA,	)	
Plaintiff-Intervenor,	)	
	)	
v.	)	Case No. 6:18-cv-03177-RK
	)	
NEW PRIME, INC.,	)	
d/b/a PRIME, INC.,	)	
Defendant.	)	

**AMENDED NOTICE TO TAKE VIDEO DEPOSITION AND DUCES TECUM**

**YOU ARE HEREBY NOTIFIED THAT** the deposition of Louise F. Fitzgerald, Ph.D., a witness identified by Plaintiff Equal Employment Opportunity Commission (“EEOC”) under Fed. R. Civ. P. 26(a)(2), will be taken to be used in the above entitled cause under Fed. R. Civ. P. 26(a)(4) and Fed. R. Civ. P. 30(a). Pursuant to Fed. R. Civ. P. 30(b)(2), Ms. Fitzgerald and Plaintiff EEOC are requested to produce at the deposition the documents and things identified in Exhibit A, attached hereto. Such deposition will be taken as hereinafter set forth:

**PLACE:** The deposition will be taken at the Hyatt Place Fort Lauderdale Airport & Cruise Port, 91 SW 18<sup>th</sup> Ave. Dania Beach, Florida 33004 in the “Boardroom” Conference room.

**TIME:** The deposition will begin at 9:00 a.m. on Thursday, August 15, and shall continue from day to day, or as long as is necessary to complete.

**WITNESSES TO BE DEPOSED:** Louise Fitzgerald.

**COURT REPORTER:** Court reporting services to be provided by Alaris.

**VIDEOGRAPHER:** Video services to be provided by Alaris.

Respectfully submitted,

BAIRD LIGHTNER MILLSAP P.C.

By /s/ Tina G. Fowler

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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 7th day of August, 2019, I electronically filed the above and foregoing document using the Court's e-filing system which sent notification to the following:

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/s/ Tina G. Fowler  
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